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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * * *

JANE DOE, an individual

Plaintiff,

v.

**GREGORY E. BURNS, (a/k/a GREG
TRAVELL), an Individual; DOES
I through X inclusive; and ROE
BUSINESS ENTITIES I through
X inclusive.**

Defendant.

CASE NO: 2:22-cv-00476-GMN-VCF

**APPENDIX OF EXHIBITS IN SUPPORT OF
DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION TO REMAND
CASE TO EIGHTH JUDICIAL
DISTRICT COURT, CLARK COUNTY
NEVADA**

EXHIBIT A - Declaration of James Stern with attachment;

EXHIBIT B - Proof of Service for Pennsylvania Lawsuit;

EXHIBIT C - Pennsylvania Lawsuit;

EXHIBIT D - California Superior Court Verdicts.

DATED: April 28th, 2022.

Respectfully Submitted:

CHESNOFF & SCHONFELD

/s/ Richard A. Schonfeld
RICHARD A. SCHONFELD, ESQ.
Nevada Bar No. 6815
520 South Fourth Street
Las Vegas, Nevada 89101
(702) 384-5563
Attorney for Defendant

EXHIBIT
A

DECLARATION OF JAMES STERN

I, JAMES CARL STERN, attest and declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am over the age of 18 years old and am competent to testify if called upon as a witness in this matter. That I have personal knowledge of the facts set forth in this Declaration.
2. I am a retired FBI Special Agent with over 25 years' experience where I was last in charge of the Asian Organized Crime Unit at FBI Headquarters in Washington, D.C., and have testified as an expert witness in this field before the United States Senate Judiciary Committee.
3. During my tenure with the FBI, I served in a variety of posts, including as an expert polygraph examiner, SWAT team member, and as the FBI Attaché responsible for investigations and liaison in Hong Kong, PRC, India, Macau, Nepal, and Sri Lanka.
4. I am a fluent Japanese speaker and was also assigned to the headquarters of Japan's National Police Agency in Tokyo and worked side-by-side with Japanese police officers on Japanese Organized Crime (Yakuza) matters.

///

1 5. I was assigned to several high profile FBI investigations to include the
2 kidnapping and murder of Journalist Daniel Pearl, the 2001 Anthrax attacks,
3 lead Agent assigned to the 9/11 terrorist attacks, the Tylenol Aspirin
4 poisoning and extortion investigation, Osama bin Laden manhunt in Pakistan,
5 multiple murder investigations of American Citizens overseas, the polygraph
6 interrogation of Saddam Hussein's bodyguard, and the extensive retraining in
7 Bosnia and Herzegovina of their police officers after the Bosnian War. I was
8 also a member of the FBI SWAT team assigned to the 1984 Los Angeles
9 Summer Olympics.
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13 6. After retiring from the FBI, I served for 12 years as the Senior Vice President,
14 and later Executive Vice President, for all security and investigative matters
15 for Wynn Resorts Limited. I held this position from June 2007 to April 2019.
16 In this role, I was responsible for worldwide security operations for Wynn
17 Resorts. This included assisting on Regulatory Compliance matters and
18 managing all hotel security operations to include tactical Special Operations
19 Officers, General Security Officers, K-9 Security Officers, Surveillance
20 Security Officers, Corporate Investigations, Cyber Investigators, and all
21 Employment and Misconduct investigations.
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- 1 7. I was also a member of the Compliance Committee for Wynn Resorts and was
2 responsible for overseeing the due diligence of Gaming Promoters at the
3 Macau properties. I founded the Wynn Nightclub Task Force that was
4 initiated in December 2009, which oversaw the operation of the company
5 nightclubs to ensure proper physical security and regulatory compliance as
6 dictated by the Nevada Gaming Control Board, Las Vegas Metropolitan
7 Police Department, and the Clark County Business License Department.
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- 10 8. I am currently an employee of Chesnoff & Schonfeld. In this case, I
11 conducted research regarding the Plaintiff's residency. I searched open-
12 source databases and performed investigative analysis.
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- 15 9. Through my research in this case I was able to locate the 197th
16 Commencement of the Thomas Jefferson University, Undergraduate and
17 Graduate Ceremony book. The book reflects that the ceremony took place on
18 May 14, 2021. Submitted herewith are the cover page of the ceremony book
19 and page number 8 where Plaintiff's name with the City and State of Hatfield,
20 PA appear next to her name. This has been redacted as Plaintiff has filed as
21 Jane Doe.
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- 25 10. Through my research I was also able to determine that public records reflect
26 Plaintiff's residential history being in Hatfield, PA from April 2020 to April
27 of 2022. The residential history reflected an overlap with a residence in
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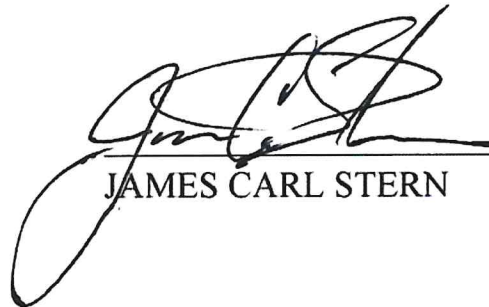
1 Nevada up until June of 2021. However, after June of 2021, the residential
2 history on the open-source database reflects residences exclusively in
3 Hatfield, PA. However, the residence in Nevada is owned by her parents.
4

5
6 11. I reserve the right to supplement and/or amend this Declaration.

7 I certify (or declare) under penalty of perjury under the laws of the State
8 of Nevada that the foregoing is true and correct.

9 Executed on April 22, 2022.

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JAMES CARL STERN

197TH COMMENCEMENT

THOMAS JEFFERSON UNIVERSITY
PHILADELPHIA, PENNSYLVANIA

1824 — 2021

■
Friday, May 14, 2021
10:30 a.m.

■
Mann Center for the Performing Arts

■
UNDERGRADUATE AND GRADUATE CEREMONY
Jefferson College of Nursing

[REDACTED]

[REDACTED]

..... Hatfield, PA

[REDACTED]

**EXHIBIT
B**

21007321



MONTGOMERY COUNTY SHERIFF'S DEPARTMENT ORDER FOR SERVICE

(Please prepare a separate request for service form for each defendant to be served by the Sheriff)

To: Sheriff Sean P. Kilkenny
Montgomery County Court House
P.O. Box 311
Norristown, Pennsylvania 19404-0311
Phone: 610-278-3331 Fax: 610-278-3832

Date: 9/10/2021

Prothonotary No. 21-18123

Sheriff Cost: \$67.00

Attorney's Or Plaintiff's Name and Address:

Patricia M. Hamill, Esq.
Conrad O'Brien PC
1500 Market Street, Centre Square
West Tower, Suite 3900
Philadelphia, PA 19102-2100

ATTY. ID# 48416

Telephone: 215-864-9600

<input checked="" type="checkbox"/> Civil Action	Writ of Execution Levy
<input type="checkbox"/> Confessed Judgment	Interrogatories
<input type="checkbox"/> Complaint in Ejectment	Writ of Execution Garnishee
<input type="checkbox"/> Posting	Writ of Seizure
<input type="checkbox"/> Writ of Possession	Mortgage Foreclosure
<input type="checkbox"/> Other:	Court Order:

GREGORY BURNS

vs.

PLAINTIFF

DEFENDANT

Service Upon:

LOCATION (MUST HAVE VALID ADDRESS OR DIRECTIONS)

Line Lexington Road
Hatfield, PA 19440

FOR SHERIFF USE ONLY

SHERIFF'S RETURN

PERSON SERVED

RELATIONSHIP/POSITION

PLACE OF SERVICE

DATE OF SERVICE

TIME OF SERVICE

NUMBER OF ATTEMPTS

DEPUTY

DEPUTY

LAST DAY FOR SERVICE

SERVICE NOT MADE BECAUSE:

DATE:	TIME:	DE
NO SERVICE	BAD ADDRESS	
MOVED	BUILDING VACANT	

POSS



2021-18123-0003 9/17/2021 10:35 AM # 13255838
Rcpt#Z4133381 Fee:\$0.00 (Internal Use Only) Served
Main (Public)
MontCo Prothonotary

ADDRESS

DATE: TIME: DEPUTY: DEPUTY:

ATTEMPTED SERVICE DATE & TIME

9.14.21 2 0755 MS - note
9.15.21 0 0530 MS - left VM

STAMP

SEP 13 P 3:17
MONTGOMERY CO. PA


EXHIBIT
C

Case# 2021-18123-2 Docketed at Montgomery County Prothonotary on 09/09/2021 9:05 PM, Fee = \$0.00. The filer certifies that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

CONRAD O'BRIEN PC
 Patricia M. Hamill (ID No. 48416)
 David I. Singh (ID No. 321573)
 1500 Market Street, Centre Square
 West Tower, Suite 3900
 Philadelphia, PA 19102-2100
 Phone: (215) 864-9600
 Fax: (215) 864-0064
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dsingh@conradobrien.com

*Attorneys for Plaintiff,
 Gregory Burns*



IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

GREGORY BURNS,)	CIVIL ACTION
)	
Plaintiff,)	NO. 2021-18123
)	
vs.)	JURY TRIAL DEMANDED
)	
)	
)	
Defendant.)	

COMPLAINT IN CIVIL ACTION

Plaintiff Gregory Burns, by and through his undersigned counsel, files the following
 Complaint in Civil Action:

PARTIES

1. Plaintiff Gregory Burns ("Burns") is an adult individual residing at 4525 Dean Martin Drive, Unit 1106, Las Vegas, Nevada 89103.
2. Defendant  is an adult individual residing at  Line Lexington Road, Hatfield, Pennsylvania 19440.

JURISDICTION AND VENUE

3. This action arises under the laws of the Commonwealth of Pennsylvania and is within the subject matter jurisdiction of this Court under 42 Pa.C.S. § 931.

4. This Court has personal jurisdiction over [REDACTED] under 42 Pa.C.S. § 5301 because [REDACTED] was present and/or domiciled in Pennsylvania at the time when process was served.

5. Venue in this Court is proper under Pa.R.C.P. 1006 because [REDACTED] may be served in Montgomery County, the causes of action arose in Montgomery County, and/or certain transactions or occurrences out of which the causes of action arose took place in Montgomery County.

FACTUAL BACKGROUND

6. On June 8, 2021, Burns received a demand from [REDACTED] for a monetary payment based on false allegations that he placed a date rape drug in her drink at a nightclub years before. Prior to receiving this letter, Burns had no knowledge that [REDACTED] was accusing him of giving her a date rape drug. As a result of investigation into this demand, on August 18, 2021, Burns learned from a voluntary statement provided by [REDACTED] that she had published this false statement accusing him of placing a date rape drug in her drink years before. Upon information and belief, [REDACTED] has directly or indirectly published this false statement to multiple individuals including, but not limited to: (a) the following group of friends that she was out with on the evening in which she met Burns (i) Thasin Jaigirdar, (ii) Adrian Arellano, (iii) Jen Hahn, (iv) Arthur Chung; (b) [REDACTED] sister, [REDACTED]; (c) [REDACTED] friend Danielle Snajder; and (d) [REDACTED] former co-worker with the first name Claudia. Burns did not know of and could not have discovered these statements prior to June 8, 2021.

7. [REDACTED] and Burns met one time at a nightclub in Las Vegas, Nevada in 2019. [REDACTED] and Burns hit it off, laughed, and had a nice time together. [REDACTED] flirted with Burns and made comments to him to let him know she was interested, in particular after she learned that Burns was a successful businessman. Witnesses, including a friend of [REDACTED] observed [REDACTED]

and Burns mutually and consensually kissing at the club. The two left the nightclub together after [REDACTED] accepted Burns' invitation to go to his apartment.

8. [REDACTED] voluntarily left the nightclub unassisted to go with Burns to his apartment. Neither [REDACTED] friends nor any other person witnessed or described [REDACTED] as being incapacitated or unable to care for herself. Burns has never used illegal drugs and did not consume any drugs on the night in question. To exit the nightclub, [REDACTED] and Burns passed through a busy casino and by multiple members of the nightclub and the casino's security teams.

9. [REDACTED] and Burns went to Burns' apartment. [REDACTED] stayed the night at Burns' apartment, the look and value of which would have confirmed to [REDACTED] that Burns was wealthy. The next morning, Burns said good-bye to [REDACTED] before leaving for work and invited her to stay and sleep longer at his apartment. She did so. Upon waking, she gathered her belongings, and took a sweater of Burns from his closet.

10. Later that day, [REDACTED] and Burns exchanged text messages. At 4:11 p.m. in the afternoon, Burns texted [REDACTED] "[REDACTED] - It was great meeting you at Omnia :) - Greg." [REDACTED] responded at 4:58 p.m. as follows, "You too! You still need to learn how to be a local lol."

11. On that same day, [REDACTED] also exchanged text messages with other friends she was out with the night before without ever mentioning anything was amiss.

12. Burns did not drug [REDACTED] and [REDACTED] has no evidence of being drugged. Mr. Burns has never consumed illegal substances of any kind, nor procured such substances nor offered or given any illegal substances of any kind to any other person.

13. No criminal charges have been filed against Burns relating to [REDACTED] false allegation that he drugged her.

14. The published statements contained false, defamatory, damaging, and outrageous claims about Burns, falsely accusing him either explicitly or implicitly of illegal and improper conduct, i.e. drugging her.

15. The published statements have no connection to any complaint [REDACTED] made about Burns to any governmental or quasi-governmental body and were not made in the presence of any governmental or quasi-governmental body.

16. As a direct and proximate result of [REDACTED] false and defamatory claims accusing Burns of a crime of moral turpitude, Burns has suffered, and will continue to suffer, reputational and economic (special) damages.

COUNT I – DEFAMATION

17. Burns' averments in the preceding paragraphs are incorporated by reference as if the same were fully set forth herein.

18. [REDACTED] defamatory statements, detailed above, disparaged Burns' integrity, reputation, character, and professional conduct to third persons.

19. [REDACTED] falsely stated either explicitly or implicitly that Burns placed a date rape drug in a drink that he provided to her.

20. [REDACTED] defamatory statements constitute defamation in that they impute criminal misconduct and improper conduct.

21. [REDACTED] statements harmed Burns' reputation so as to lower him in the estimation of the community and to deter others from associating or dealing with him.

22. Publication of such statements was intentionally, maliciously, outrageously, knowingly, recklessly, and/or negligently made by [REDACTED]

23. As discussed above, [REDACTED] actively pursued this outrageous and malicious defamation campaign for monetary gain.

24. The recipients understood the defamatory meaning of the statements and understood the applications of such statements to Burns, who was identified by [REDACTED]

25. The statements made by [REDACTED] were false.

26. [REDACTED] knew that such statements were false and materially misleading, should have known the statements were false and materially misleading, and/or acted in reckless disregard of the truth or falsity of the statements.

27. [REDACTED] had no privilege to make such statements and/or waived or forfeited any conditional privilege.

28. As a direct and proximate result of [REDACTED] false and defamatory statements, Burns' reputation, standing in the community, and business or trade have been injured, impaired, or diminished.

29. As a direct and proximate result of [REDACTED] past and ongoing false and defamatory statements, Burns has suffered, and will continue to suffer damages, including, but not limited to, reputational damages and special damages.

WHEREFORE, Plaintiff Gregory Burns respectfully requests that this Court enter judgment in his favor and against Defendant [REDACTED] and award money damages in an amount in excess of the arbitration limit of \$50,000.00, together with punitive damages, costs, fees, interest, and such further relief as this Court may deem just and appropriate. Plaintiff Gregory Burns further requests that this Court order Defendant [REDACTED] to prepare and issue a written apology, which he may circulate to any third parties.

COUNT II – FALSE LIGHT

30. Burns' averments in the preceding paragraphs are incorporated by reference as if the same were fully set forth herein.

31. Through [REDACTED] false statements to multiple acquaintances, friends, family, and co-workers, [REDACTED] publicized private facts about Burns' honesty and integrity that are false, create an overall impression of falsehood, and place Burns in a false light before the public.

32. Such publicity would be highly offensive to a reasonable person in that [REDACTED] statements constitute a major misrepresentation of [REDACTED] character and activities.

33. Such statements are not of legitimate concern to the public.

34. [REDACTED] conduct was intentional, willful, wanton, malicious, and outrageous.

35. [REDACTED] had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which Burns would be placed.

36. The publication of such false statements caused mental suffering, shame, and/or humiliation to Burns, a person of ordinary sensibilities.

WHEREFORE, Plaintiff Gregory Burns respectfully requests that this Court enter judgment in his favor and against Defendant [REDACTED] and award money damages in an amount in excess of the arbitration limit of \$50,000.00, together with punitive damages, costs, fees, interest, and such further relief as this Court may deem just and appropriate. Plaintiff Gregory Burns further requests that this Court order Defendant [REDACTED] to prepare and issue a written apology, which he may circulate to any third parties.

JURY TRIAL DEMANDED.

Respectfully submitted,

CONRAD O'BRIEN PC

/s/ Patricia M. Hamill

Patricia M. Hamill (ID No. 48416)

David I. Singh (ID No. 321573)

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ROSENBERG & BALL CO., LPA

Eric. J. Rosenberg (*pro hac vice* forthcoming)

Tracy L. Turner (*pro hac vice* forthcoming)

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Granville, OH 43023

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Fax: (866) 498-0811

Email: erosenberg@rosenbergball.com

tturner@rosenbergball.com

Attorneys for Plaintiff, Gregory Burns

**EXHIBIT
D**

FILED
Superior Court of California
County of Los Angeles

OCT 11 2019

Sherril R. Carter, Executive Officer/Clerk
By Maria Ventura Deputy

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAUREN REEVES,

Plaintiff,

vs.

HOLOGRAM USA, INC.,
ALKI DAVID PRODUCTIONS, INC.,
ALKIVIADES DAVID, an individual and
DOES 1 through 25, inclusive,

Defendants.

CASE NO: BC 643099

Hon. Terry A. Green - Dept. 14

SPECIAL VERDICT

WE, THE JURY IN THE ABOVE-ENTITLED MATTER, FIND AS FOLLOWS:

As soon as nine or more jurors have agreed upon each answer, mark down the answer.

Battery

Question No. 1:

Did Alki David touch Lauren Reeves with the intent to harm or offend her?

9 ☒ Yes 3 No

If your answer to Question 1 is Yes, then answer Question 2. If you answered No, then proceed to Question 5.

Question No. 2:

Did Lauren Reeves consent to be touched?

 Yes X No

If your answer to Question 2 is No, then proceed to Question 3. If you answered Yes, then proceed to Question 5.

Question No. 3:

Was Lauren Reeves harmed or offended by Alki David's conduct?

X Yes X No

If your answer to Question 3 is Yes, then proceed to Question 4. If you answered No, then proceed to Question 5.

Question No. 4:

Would a reasonable person in Ms. Reeves' situation have been offended by the touching?

X Yes No

Proceed to Question No. 5

Sexual Battery

Question No. 5:

Did Alki David intend to cause a harmful or offensive contact with Lauren Reeves by use of his groin?

☒ Yes ☐ No

If your answer to Question 5 is Yes, then answer Question 6. If you answered No, then proceed to Question 9.

Question No. 6:

Did the contact with Mr. David's groin result in a sexually offensive contact either directly or indirectly?

☒ Yes ☐ No

If your answer to Question 6 is Yes, then answer Question 7. If you answered No, then proceed to Question 9.

Question No. 7:

Did Lauren Reeves consent to the touching?

☐ Yes ☒ No

If your answer to Question 7 is No, then proceed to Question 8. If you answered Yes, then proceed to Question 9.

Question No. 8:

Was Lauren Reeves harmed or offended by Alki David's conduct?

☒ Yes ☐ No

Proceed to Question No. 9

Sexual Harassment - Hostile Work Environment
(Hologram USA, Inc.)

Question No. 9:

Was Lauren Reeves a person providing services for Hologram USA, Inc.?

☒ Yes ☐ No

If your answer to Question 9 is Yes, then proceed to Question 10. If you answered No, then proceed to Question 16.

Question No. 10:

Was Lauren Reeves subjected to unwanted harassing conduct because she is a women?

☒ Yes ☐ No

If your answer to Question 10 is Yes, then proceed to Question 11. If you answered No, then proceed to Question 16.

Question No. 11:

Was the harassment severe or pervasive?

☒ Yes ☐ No

If your answer to Question 11 is Yes, then proceed to Question 12. If you answered No, then proceed to Question 16.

Question No. 12:

Would a reasonable woman in Lauren Reeves' circumstances have considered the work environment to be hostile, intimidating, offensive or abusive?

☒ Yes ☐ No

If your answer to Question 12 is Yes, then answer Question 13. If you answered No, then proceed to Question 16.

1 **Question No. 13:**

2 Did Lauren Reeves consider the work environment to be hostile, intimidating, offensive,
3 oppressive, or abusive?

4 ☒ Yes ☐ No

5 If your answer to Question 13 is Yes, then answer Question 14. If you answered No, then proceed
6 to Question 16.

7
8 **Question No. 14:**

9 Did a supervisor engage in the harassing conduct?

10 ☒ Yes ☐ No

11 If your answer to Question 14 is Yes, then answer Question 15. If you answered No, then proceed
12 to Question 16.

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14 **Question No. 15:**

15 Was the harassing conduct a substantial factor in causing harm to Lauren Reeves?

16 ☒ Yes ☐ No

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21 **Proceed to Question No. 16**

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10/18/2019

(Alki David Productions, Inc.)

Question No. 16:

Was Lauren Reeves a person providing services for Alki David Productions, Inc.?

☒ Yes ☐ No

If your answer to Question 16 is Yes, then proceed to Question 17. If you answered No, then proceed to Question 23.

Question No. 17:

Was Lauren Reeves subjected to unwanted harassing conduct because she is a women?

☒ Yes ☐ No

If your answer to Question 17 is Yes, then proceed to Question 18. If you answered No, then proceed to Question 23.

Question No. 18:

Was the harassment severe or pervasive?

☒ Yes ☐ No

If your answer to Question 18 is Yes, then proceed to Question 19. If you answered No, then proceed to Question 23.

Question No. 19:

Would a reasonable woman in Lauren Reeves' circumstances have considered the work environment to be hostile, intimidating, offensive or abusive?

☒ Yes ☐ No

If your answer to Question 19 is Yes, then answer Question 20. If you answered No, then proceed to Question 23.

Question No. 20:

Did Lauren Reeves consider the work environment to be hostile, intimidating, offensive, oppressive, or abusive?

☒ Yes ☐ No

If your answer to Question 20 is Yes, then answer Question 21. If you answered No, then proceed to Question 23.

Question No. 21:

Did a supervisor engage in the harassing conduct?

☒ Yes ☐ No

If your answer to Question 21 is Yes, then answer Question 22. If you answered No, then proceed to Question 23.

Question No. 22:

Was the harassing conduct a substantial factor in causing harm to Lauren Reeves?

☒ Yes ☐ No

Proceed to Question No. 23 and only answer Question No. 23 if you answered Yes to

Question No. 13 or 20

(Alkiviades David)

Question No. 23:

Did Alki David engage in the harassing conduct?

☒ Yes ☐ No

If your answer to Question 23 is Yes, then answer Question 24. If you answered No, then proceed to Question 25.

Question No. 24:

Was the harassing conduct a substantial factor in causing harm to Lauren Reeves?

☒ Yes ☐ No

Proceed to Question No. 25

10/18/2019

Damages

Only answer Question 25, if you answered "Yes" to any of the following Questions:

4, 8, 15, 22, or 24.

If you are not required to answer Question 25, stop here, answer no further questions and have the presiding Juror sign and date this form. Otherwise, proceed to answer Question 25.

Question No. 25:

What are Lauren Reeves damages?

A. Past non-economic loss, including physical pain/mental suffering.

Enter the amount below if you find that Hologram USA, Inc., and/or Alki David Productions, Inc., and/or Alkiviades David is/are liable to Lauren Reeves for one or more of her claims.

\$ 300,000.00

B. Future non-economic loss, including physical pain/mental suffering

Enter the amount below if you find that Hologram USA, Inc., and/or Alki David Productions, Inc., and/or Alkiviades David is/are liable to Lauren Reeves for one or more of her claims.

\$ 250,000.00

10/18/2019

1 C. Economic damages: (Past medical expenses)

2 Enter the amount below if you find that Defendants Hologram USA, Inc., and/or Alki
3 David Productions, Inc and/or Alkiviades David is/are liable to Lauren Reeves under any of her
4 claims.

5
6 \$ 20,000.00
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10 D. Economic damages: (Future medical expenses)

11 Enter the amount below if you find that Defendants Hologram USA, Inc., and/or Alki
12 David Productions, Inc and/or Alkiviades David is/are liable to Lauren Reeves under any of her
13 claims.

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15 \$ 80,000.00
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10/18/2019

Punitive Damages

Only answer question 26 below if you awarded damages in question 25. If you did not award damages in question 25, stop here, answer no further questions, and have the presiding Juror sign and date this form.

Otherwise, proceed to answer Question no. 26.

Question No. 26:

Did Ms. Reeves prove by clear and convincing evidence that Mr. David engaged in harassing conduct with malice, oppression, or fraud?

☒ Yes ☐ No

Have the Presiding Juror sign and date this form.

THE ABOVE IS THE VERDICT OF THIS JURY IN THIS CASE.

Please have your foreperson sign and date this special verdict form.

Signed:

Diane M. O'Leary
PRESIDING JUROR

Dated:

10/11/19

Juror # 6
Presiding

10/18/2019

FILED
Superior Court of California
County of Los Angeles

OCT 15 2019

Sherril R. Carter, Executive Officer/Clerk
By Marisa Ventura Deputy
Marisa Ventura

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAUREN REEVES,

Plaintiff,

vs.

HOLOGRAM USA, INC.,
ALKI DAVID PRODUCTIONS, INC.,
ALKIVIADES ("ALKI") DAVID.

Defendants.

CASE NO: BC 643099

Hon. Terry A. Green - Dept. 14

SPECIAL VERDICT (PHASE II)

**WE, THE JURY IN THE ABOVE-ENTITLED MATTER, FIND THE
FOLLOWING SPECIAL VERDICT ON THE QUESTION PRESENTED TO US:**

1
2 1. What amount of punitive damages, if any, do you award Lauren Reeves against
3 Alkiviades David?

4 \$ 4,350,000.00

5
6
7 **Have the Presiding Juror sign and date this form.**

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10 Signed: Irene M Ochoa
11 PRESIDING JUROR

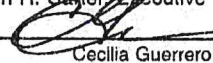
Dated: 10/15/19

12 Print Name: Irene M Ochoa

13
14
15
16 **After this verdict form has been signed, notify the courtroom assistant that you are ready to**
17 **present your verdict in the courtroom.**

FILED
Superior Court of California
County of Los Angeles

NOV 26 2019

Sherri R. Carter, Executive Officer/Clerk
By  Deputy
Cecilia Guerrero

es

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MAHIM KHAN,

Plaintiff,

vs.

HOLOGRAM USA, INC.,
ALKI DAVID PRODUCTIONS, INC.,
FILMON TV, INC.; and ALKIVIADES
("ALKI") DAVID.

Defendants.

CASE NO: BC 654017

Hon. Michelle Williams Court - Dept. 74

SPECIAL VERDICT

WE, THE JURY IN THE ABOVE-ENTITLED MATTER, FIND AS FOLLOWS:

As soon as nine or more jurors have agreed upon each answer, mark down the answer.

12/05/2019

Battery

Question No. 1:

Did Alki David touch Mahim Khan with the intent to harm or offend her?

☒ Yes ☐ No

If your answer to Question 1 is Yes, then answer Question 2. If you answered No, then proceed to Question 5.

Question No. 2:

Did Mahim Khan consent to be touched?

☐ Yes ☒ No

If your answer to Question 2 is No, then proceed to Question 3. If you answered Yes, then proceed to Question 5.

Question No. 3:

Was Mahim Khan harmed or offended by Alki David's conduct?

☒ Yes ☐ No

If your answer to Question 3 is Yes, then proceed to Question 4. If you answered No, then proceed to Question 5.

Question No. 4:

Would a reasonable person in Ms. Khan's situation have been offended by the touching?

☒ Yes ☐ No

Proceed to Question No. 5

Sexual Battery

Question No. 5:

Did Alki David intend to cause a harmful or offensive contact with Mahim Khan's breasts and/or buttocks and/or groin?

☒ Yes ☐ No

If your answer to Question 5 is Yes, then answer Question 6. If you answered No, then proceed to Question 9.

Question No. 6:

Did Mr. David's conduct result in a sexually offensive contact either directly or indirectly?

☒ Yes ☐ No

If your answer to Question 6 is Yes, then answer Question 7. If you answered No, then proceed to Question 9.

Question No. 7:

Did Mahim Khan consent to the touching?

☐ Yes ☒ No

If your answer to Question 7 is No, then proceed to Question 8. If you answered Yes, then proceed to Question 9.

Question No. 8:

Was Mahim Khan harmed or offended by Alki David's conduct?

☒ Yes ☐ No

Proceed to Question No. 9

Sexual Harassment - Hostile Work Environment
(Hologram USA, Inc.)

Question No. 9:

Was Mahim Khan an employee of Hologram USA, Inc.?

☐ Yes ☒ No

If your answer to Question 9 is Yes, then proceed to Question 10. If you answered No, then proceed to Question 16.

Question No. 10:

Was Mahim Khan subjected to unwanted harassing conduct because she is a woman?

☐ Yes ☐ No

If your answer to Question 10 is Yes, then proceed to Question 11. If you answered No, then proceed to Question 16.

Question No. 11:

Was the harassment severe or pervasive?

☐ Yes ☐ No

If your answer to Question 11 is Yes, then proceed to Question 12. If you answered No, then proceed to Question 16.

Question No. 12:

Would a reasonable woman in Mahim Khan's circumstances have considered the work environment to be hostile, intimidating, offensive or abusive?

☐ Yes ☐ No

If your answer to Question 12 is Yes, then answer Question 13. If you answered No, then proceed to Question 16.

1 **Question No. 13:**

2 Did Mahim Khan consider the work environment to be hostile, intimidating, offensive,
3 oppressive, or abusive?

4 ☐ Yes ☐ No

5 If your answer to Question 13 is Yes, then answer Question 14. If you answered No, then
6 proceed to Question 16.

7
8 **Question No. 14:**

9 Did a supervisor engage in the harassing conduct?

10 ☐ Yes ☐ No

11 If your answer to Question 14 is Yes, then answer Question 15. If you answered No, then
12 proceed to Question 16.

13
14 **Question No. 15:**

15 Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

16 ☐ Yes ☐ No

17

18

19

20

21 **Proceed to Question No. 16**

22

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12/05/2019

Sexual Harassment - Hostile Work Environment
(Alki David Productions, Inc.)

Question No. 16:

Was Mahim Khan an employee of Alki David Productions, Inc.?

☒ Yes ☐ No

If your answer to Question 16 is Yes, then proceed to Question 17. If you answered No, then proceed to Question 23.

Question No. 17:

Was Mahim Khan subjected to unwanted harassing conduct because she is a women?

☒ Yes ☐ No

If your answer to Question 17 is Yes, then proceed to Question 18. If you answered No, then proceed to Question 23.

Question No. 18:

Was the harassment severe or pervasive?

☒ Yes ☐ No

If your answer to Question 18 is Yes, then proceed to Question 19. If you answered No, then proceed to Question 23.

Question No. 19:

Would a reasonable woman in Mahim Khan's circumstances have considered the work environment to be hostile, intimidating, offensive or abusive?

☒ Yes ☐ No

If your answer to Question 19 is Yes, then answer Question 20. If you answered No, then proceed to Question 23.

1 **Question No. 20:**

2 Did Mahim Khan consider the work environment to be hostile, intimidating, offensive,
3 oppressive, or abusive?

4 ☒ Yes ☐ No

5 If your answer to Question 20 is Yes, then answer Question 21. If you answered No, then
6 proceed to Question 23.

7
8 **Question No. 21:**

9 Did a supervisor engage in the harassing conduct?

10 ☒ Yes ☐ No

11 If your answer to Question 21 is Yes, then answer Question 22. If you answered No, then
12 proceed to Question 23.

13
14 **Question No. 22:**

15 Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

16 ☒ Yes ☐ No

17
18
19
20
21 **Proceed to Question No. 23.**

12/05/2019

Sexual Harassment - Hostile Work Environment
(FilmOn TV, Inc.)

Question No. 23:

Was Mahim Khan an employee of FilmOn TV, Inc.?

☒ Yes ☐ No

If your answer to Question 23 is Yes, then proceed to Question 24. If you answered No, then proceed to Question 30.

Question No. 24:

Was Mahim Khan subjected to unwanted harassing conduct because she is a women?

☒ Yes ☐ No

If your answer to Question 24 is Yes, then proceed to Question 25. If you answered No, then proceed to Question 30.

Question No. 25:

Was the harassment severe or pervasive?

☒ Yes ☐ No

If your answer to Question 25 is Yes, then proceed to Question 26. If you answered No, then proceed to Question 30.

Question No. 26:

Would a reasonable woman in Mahim Khan's circumstances have considered the work environment to be hostile, intimidating, offensive or abusive?

☒ Yes ☐ No

If your answer to Question 26 is Yes, then answer Question 27. If you answered No, then proceed to Question 30.

12/05/2019

1 **Question No. 27:**

2 Did Mahim Khan consider the work environment to be hostile, intimidating, offensive,
3 oppressive, or abusive?

4 ☒ Yes ☐ No

5 If your answer to Question 27 is Yes, then answer Question 28. If you answered No, then
6 proceed to Question 30.

7
8 **Question No. 28:**

9 Did a supervisor engage in the harassing conduct?

10 ☒ Yes ☐ No

11 If your answer to Question 28 is Yes, then answer Question 29. If you answered No, then
12 proceed to Question 30.

13
14 **Question No. 29:**

15 Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

16 ☒ Yes ☐ No

17
18
19
20
21 **Proceed to Question No. 30**

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12/05/2019

Sexual Harassment - Hostile Work Environment
(Alkiviades ("Alki") David)

Only answer Question No. 30 if you answered Yes to Question No. 13 or 20 or 27.

If you are not required to answer Question No. 30, proceed to Question No. 32.

Question No. 30:

Did Alki David engage in the harassing conduct?

☒ Yes ☐ No

If your answer to Question 30 is Yes, then answer Question 31. If you answered No, then proceed to Question 32.

Question No. 31:

Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

☒ Yes ☐ No

Proceed to Question No. 32

12/05/2019

Damages

Only answer Question 32, if you answered "Yes" to any of the following Questions:

4, 8, 15, 22, 29, or 31.

If you are not required to answer Question 32, stop here, answer no further questions and have the presiding Juror sign and date this form. Otherwise, proceed to answer Question 32.

Question No. 32

What are Mahim Khan's damages?

A. Past Non-Economic loss, including physical pain/mental suffering.

Enter the amount below if you find that Hologram USA, Inc. and/or Alki David Productions, Inc., and/or FilmOn TV, Inc., and/or Alkiviades David is/are liable to Mahim Khan for one or more of her claims.

\$ 3,000,000

B. Future Non-Economic loss, including physical pain/mental suffering.

Enter the amount below if you find that Hologram USA, Inc. And/or Alki David Productions, Inc., and/or FilmOn TV, Inc., and/or Alkiviades David is/are liable to Mahim Khan for one or more of her claims.

\$ 5,000,000

12/05/2019

1 C. Past Economic losses:

2 Enter the amount below if you find that Hologram USA, Inc. And/or Alki David
3 Productions, Inc., and/or FilmOn TV, Inc., and/or Alkiviades David is/are liable to Mahim Khan
4 for one or more of her claims.

5 Lost earnings \$ 40,000

6 Medical expenses \$ 0

7
8 D. Future Economic losses:

9 Lost earnings \$ 80,000

10 Medical expenses \$ 130,000

11
12
13
14 **Proceed to Question no. 33**
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12/05/2019

Punitive Damages

Only answer Question 33 below if you awarded damages in Question No. 32. If you did not award damages in Question No. 32, stop here, answer no further questions, and have the presiding Juror sign and date this form. Otherwise, proceed to answer Question No. 33.

Question No. 33:

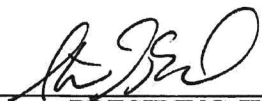
Did Mahim Khan prove by clear and convincing evidence that Mr. David engaged in harassing conduct with malice, oppression, or fraud?

☒ Yes ☐ No

Have the Presiding Juror sign and date this form.

THE ABOVE IS THE VERDICT OF THIS JURY IN THIS CASE.

Please have your foreperson sign and date this special verdict form.

Signed:  Dated: 11/26/19
PRESIDING JUROR
Juror No. 7

After this verdict form has been signed, notify the clerk that you are ready to present your verdict in the courtroom.

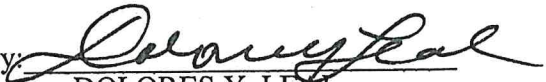
12/05/2019

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 **PLEASE TAKE NOTICE** that the Superior Court for the County of Los Angeles
3 received the Proposed Judgment on Special Verdict submitted on December 3, 2019. The
4 Judgment on Special Verdict was signed and filed on December 18, 2019. A copy of the
5 Judgment on Special Verdict signed by Judge Michelle Williams Court is attached hereto.

6
7 DATED: January 21, 2020

ALLRED, MAROKO & GOLDBERG

8 By: 
9 DOLORES Y. LEAL
10 Attorneys for Plaintiff,
11 MAHIM KHAN
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1 GLORIA R. ALLRED, STATE BAR #065033
 2 NATHAN GOLDBERG, STATE BAR #61292
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Telephone No. (323) 653-6530

Facsimile No. (323) 653-1660

8 Attorneys for **Plaintiff, MAHIM KHAN**

10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
 11 FOR THE COUNTY OF LOS ANGELES

13 MAHIM KHAN, an individual,

14 Plaintiff,

15 vs.

16 HOLOGRAM USA, INC.; ALKI DAVID
 17 PRODUCTIONS, INC.; FILMON TV,
 18 INC.; ALKIVIADES ("ALKI") DAVID, an
 individual and DOES 1 through 25,
 inclusive,

20 Defendants.

) CASE NO: BC654017

) Hon. Michelle Williams Court - Dept. 74

) **~~(PROPOSED)~~**
) **JUDGMENT ON JURY SPECIAL**
) **VERDICT**

23 This action came on regularly for trial on October 28, 2019, in Department 74 of the
 24 Superior Court, the Hon. Michelle Williams Court judge presiding; the Plaintiff Mahim Khan
 25 appearing by attorneys Nathan Goldberg and Dolores Y. Leal; Defendants Hologram USA, Inc.,
 26 Alki David Productions, Inc., and Filmon TV, Inc. appearing by attorneys Ellyn Garofalo and
 27 Amir Kaltgrad, and Defendant Alkiviades ("Alki") David appearing in propria persona.

1 A jury of 12 persons was regularly impaneled and sworn. Witnesses were sworn and
2 testified. After hearing the evidence and arguments of counsel, the jury was duly instructed by
3 the Court and the cause was submitted to the jury (with directions to return a verdict on special
4 issues). The jury deliberated and thereafter returned into court with its verdicts as follows:

5 (PHASE ONE)

6 **WE, THE JURY IN THE ABOVE-ENTITLED MATTER, FIND AS FOLLOWS:**

7 As soon as nine or more jurors have agreed upon each answer, mark down the answer.

8 **Battery**

9 **Question No. 1:**

10 Did Alki David touch Mahim Khan with the intent to harm or offend her?

11 ☒ Yes ☐ No

12 If your answer to Question 1 is Yes, then answer Question 2. If you answered No, then proceed
13 to Question 5.

14
15 **Question No. 2:**

16 Did Mahim Khan consent to be touched?

17 ☐ Yes ☒ No

18 If your answer to Question 2 is No, then proceed to Question 3. If you answered Yes, then
19 proceed to Question 5.

20
21 **Question No. 3:**

22 Was Mahim Khan harmed or offended by Alki David's conduct?

23 ☒ Yes ☐ No

24 If your answer to Question 3 is Yes, then proceed to Question 4. If you answered No, then
25 proceed to Question 5.

26 ///

27 ///

1 **Question No. 4:**

2 Would a reasonable person in Ms. Khan's situation have been offended by the touching?

3 ☒ Yes ☐ No

4

5 **Proceed to Question No. 5**

6

7

Sexual Battery

8 **Question No. 5:**

9 Did Alki David intend to cause a harmful or offensive contact with Mahim Khan's

10 breasts and/or buttocks and/or groin?

11 ☒ Yes ☐ No

12 If your answer to Question 5 is Yes, then answer Question 6. If you answered No, then proceed
13 to Question 9.

14

15 **Question No. 6:**

16 Did Mr. David's conduct result in a sexually offensive contact either directly or

17 indirectly?

18 ☒ Yes ☐ No

19 If your answer to Question 6 is Yes, then answer Question 7. If you answered No, then proceed
20 to Question 9.

21

22 **Question No. 7:**

23 Did Mahim Khan consent to the touching?

24 ☐ Yes ☒ No

25 If your answer to Question 7 is No, then proceed to Question 8. If you answered Yes, then
26 proceed to Question 9.

27 ///

28

1 **Question No. 8:**

2 Was Mahim Khan harmed or offended by Alki David's conduct?

3 ☒ Yes ☐ No

4 **Proceed to Question No. 9**

5

6

7

Sexual Harassment - Hostile Work Environment
(Hologram USA, Inc.)

8

9 **Question No. 9:**

10 Was Mahim Khan an employee of Hologram USA, Inc.?

11 ☐ Yes ☒ No

12 If your answer to Question 9 is Yes, then proceed to Question 10. If you answered No, then
13 proceed to Question 16.

14

15 **Question No. 10:**

16 Was Mahim Khan subjected to unwanted harassing conduct because she is a woman?

17 ☐ Yes ☐ No

18 If your answer to Question 10 is Yes, then proceed to Question 11. If you answered No, then
19 proceed to Question 16.

20

21 **Question No. 11:**

22 Was the harassment severe or pervasive?

23 ☐ Yes ☐ No

24 If your answer to Question 11 is Yes, then proceed to Question 12. If you answered No, then
25 proceed to Question 16.

26 ///

27 ///

28

1 **Question No. 12:**

2 Would a reasonable woman in Mahim Khan's circumstances have considered the work
3 environment to be hostile, intimidating, offensive or abusive?

4 ☐ Yes ☐ No

5 If your answer to Question 12 is Yes, then answer Question 13. If you answered No, then proceed
6 to Question 16.

7
8 **Question No. 13:**

9 Did Mahim Khan consider the work environment to be hostile, intimidating, offensive,
10 oppressive, or abusive?

11 ☐ Yes ☐ No

12 If your answer to Question 13 is Yes, then answer Question 14. If you answered No, then proceed
13 to Question 16.

14
15 **Question No. 14:**

16 Did a supervisor engage in the harassing conduct?

17 ☐ Yes ☐ No

18 If your answer to Question 14 is Yes, then answer Question 15. If you answered No, then proceed
19 to Question 16.

20
21 **Question No. 15:**

22 Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

23 ☐ Yes ☐ No

24
25 **Proceed to Question No. 16**

26 ///

27 ///

28

Sexual Harassment - Hostile Work Environment
(Alki David Productions, Inc.)

Question No. 16:

Was Mahim Khan an employee of Alki David Productions, Inc.?

☒ Yes ☐ No

If your answer to Question 16 is Yes, then proceed to Question 17. If you answered No, then proceed to Question 23.

Question No. 17:

Was Mahim Khan subjected to unwanted harassing conduct because she is a women?

☒ Yes ☐ No

If your answer to Question 17 is Yes, then proceed to Question 18. If you answered No, then proceed to Question 23.

Question No. 18:

Was the harassment severe or pervasive?

☒ Yes ☐ No

If your answer to Question 18 is Yes, then proceed to Question 19. If you answered No, then proceed to Question 23.

Question No. 19:

Would a reasonable woman in Mahim Khan's circumstances have considered the work environment to be hostile, intimidating, offensive or abusive?

☒ Yes ☐ No

If your answer to Question 19 is Yes, then answer Question 20. If you answered No, then proceed to Question 23.

///

1 **Question No. 20:**

2 Did Mahim Khan consider the work environment to be hostile, intimidating, offensive,
3 oppressive, or abusive?

4 ☒ Yes ☐ No

5 If your answer to Question 20 is Yes, then answer Question 21. If you answered No, then proceed
6 to Question 23.

7
8 **Question No. 21:**

9 Did a supervisor engage in the harassing conduct?

10 ☒ Yes ☐ No

11 If your answer to Question 21 is Yes, then answer Question 22. If you answered No, then proceed
12 to Question 23.

13
14 **Question No. 22:**

15 Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

16 ☒ Yes ☐ No

17
18 **Proceed to Question No. 23.**

19
20 **Sexual Harassment - Hostile Work Environment**
21 **(FilmOn TV, Inc.)**

22 **Question No. 23:**

23 Was Mahim Khan an employee of FilmOn TV, Inc.?

24 ☒ Yes ☐ No

25 If your answer to Question 23 is Yes, then proceed to Question 24. If you answered No, then
26 proceed to Question 30.

27 ///

28 ///

1 **Question No. 24:**

2 Was Mahim Khan subjected to unwanted harassing conduct because she is a women?

3 ☒ Yes ☐ No

4 If your answer to Question 24 is Yes, then proceed to Question 25. If you answered No, then
5 proceed to Question 30.

6

7 **Question No. 25:**

8 Was the harassment severe or pervasive?

9 ☒ Yes ☐ No

10 If your answer to Question 25 is Yes, then proceed to Question 26. If you answered No, then
11 proceed to Question 30.

12

13 **Question No. 26:**

14 Would a reasonable woman in Mahim Khan's circumstances have considered the work
15 environment to be hostile, intimidating, offensive or abusive?

16 ☒ Yes ☐ No

17 If your answer to Question 26 is Yes, then answer Question 27. If you answered No, then proceed
18 to Question 30.

19

20 **Question No. 27:**

21 Did Mahim Khan consider the work environment to be hostile, intimidating, offensive,
22 oppressive, or abusive?

23 ☒ Yes ☐ No

24 If your answer to Question 27 is Yes, then answer Question 28. If you answered No, then proceed
25 to Question 30.

26 ///

27 ///

28

1 **Question No. 28:**

2 Did a supervisor engage in the harassing conduct?

3 ☒ Yes ☐ No

4 If your answer to Question 28 is Yes, then answer Question 29. If you answered No, then proceed
5 to Question 30.

6
7 **Question No. 29:**

8 Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

9 ☒ Yes ☐ No

10
11 **Proceed to Question No. 30**

12
13 **Sexual Harassment - Hostile Work Environment**
14 **(Alkiviades ("Alki") David)**

15 **Only answer Question No. 30 if you answered Yes to Question No. 13 or 20 or 27.**

16 **If you are not required to answer Question No. 30, proceed to Question No. 32.**

17
18 **Question No. 30:**

19 Did Alki David engage in the harassing conduct?

20 ☒ Yes ☐ No

21 If your answer to Question 30 is Yes, then answer Question 31. If you answered No, then proceed
22 to Question 32.

23
24 **Question No. 31:**

25 Was the harassing conduct a substantial factor in causing harm to Mahim Khan?

26 ☒ Yes ☐ No

27 **Proceed to Question No. 32**

28

Damages

Only answer Question 32, if you answered "Yes" to any of the following Questions:
4, 8, 15, 22, 29, or 31.

If you are not required to answer Question 32, stop here, answer no further questions and have the presiding Juror sign and date this form. Otherwise, proceed to answer Question 32.

Question No. 32

What are Mahim Khan's damages?

A. Past Non-Economic loss, including physical pain/mental suffering.

Enter the amount below if you find that Hologram USA, Inc. and/or Alki David Productions, Inc., and/or FilmOn TV, Inc., and/or Alkiviades David is/are liable to Mahim Khan for one or more of her claims.

\$ 3,000,000.

B. Future Non-Economic loss, including physical pain/mental suffering.

Enter the amount below if you find that Hologram USA, Inc. And/or Alki David Productions, Inc., and/or FilmOn TV, Inc., and/or Alkiviades David is/are liable to Mahim Khan for one or more of her claims.

\$ 5,000,000.

1 C. Past Economic losses:

2 Enter the amount below if you find that Hologram USA, Inc. And/or Alki David
3 Productions, Inc., and/or FilmOn TV, Inc., and/or Alkiviades David is/are liable to Mahim Khan
4 for one or more of her claims.

5 Lost earnings \$ 40,000.

6 Medical expenses \$ 0

7
8 D. Future Economic losses:

9 Lost earnings \$ 80,000.

10 Medical expenses \$ 130,000.

11 Proceed to Question no. 33

12
13 Punitive Damages

14 Only answer Question 33 below if you awarded damages in Question No. 32. If you did not
15 award damages in Question No. 32, stop here, answer no further questions, and have the
16 presiding Juror sign and date this form. Otherwise, proceed to answer Question No. 33.

17
18 **Question No. 33:**

19 Did Mahim Khan prove by clear and convincing evidence that Mr. David engaged in
20 harassing and/or violent conduct with malice, oppression, or fraud?

21 ☒ Yes ☐ No


22
23 It appearing by reason of said verdict that plaintiff Mahim Khan is entitled to judgment
24 against defendants Alki David Productions, Inc., Filmon TV, Inc., and Alkiviades ("Alki") David,
25 jointly and severally.

26 ///

27 ///

9 WE, THE JURY IN THE ABOVE-ENTITLED MATTER, FIND THE
10 FOLLOWING SPECIAL VERDICT ON THE QUESTION PRESENTED TO US:

16 It appearing by reason of said verdict that plaintiff Mahim Khan is entitled to judgment
17 against defendant Alkiviades ("Alki") David in the amount of \$50,000,000.


Hon. Michelle Williams Court
Judge of the Superior Court

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **December 3, 2019** I served the foregoing document described as **(PROPOSED) JUDGMENT ON JURY SPECIAL VERDICT** on interested parties in this action

☒ by placing ☐ the original ☒ a true copy thereof enclosed in sealed envelopes at Los Angeles, California addressed as follows:

Ellyn S. Garofalo, Esq.
Amir Kaltgrad, Esq.
VENABLE LLP
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
esgarofalo@venable.com
amir.kaltgrad@venable.com

Alkiviades David
C/O Hologram Theatre
6656 Hollywood Boulevard
Los Angeles, CA 90028

Alkiviades David
23768 Malibu Road
Malibu, CA 90265

☒ **BY MAIL:** I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Los Angeles, California.

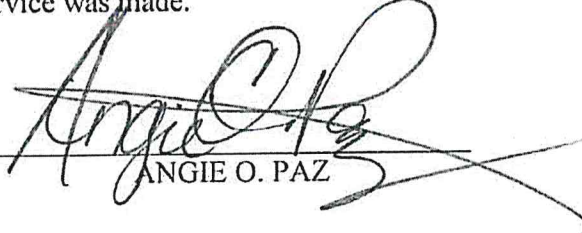
☐ **BY E-MAIL:** I caused such document to be electronically served via email to the email address of the addressee(s).

☐ **BY PERSONAL SERVICE:** I caused such envelope to be personally served on the Addressee(s) to the offices of the addressee(s).

Executed on **December 3, 2019** at Los Angeles, California.

☒ **State** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☐ **Federal** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.


ANGIE O. PAZ

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **January 21, 2020** I served the foregoing document described as **NOTICE OF ENTRY OF JUDGMENT ON SPECIAL VERDICT** on interested parties in this action

☒ by placing ☐ the original ☒ a true copy thereof enclosed in sealed envelopes at Los Angeles, California addressed as follows:

Ellyn S. Garofalo, Esq.
Amir Kaltgrad, Esq.
VENABLE LLP
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
esgarofalo@venable.com
amir.kaltgrad@venable.com

Alkiviades David
C/O Hologram Theatre
6656 Hollywood Boulevard
Los Angeles, CA 90028

Alkiviades David
23768 Malibu Road
Malibu, CA 90265

☐ **BY MAIL:** I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Los Angeles, California.

☐ **BY E-MAIL:** I caused such document to be electronically served via email to the email address of the addressee(s).

☒ **BY OVERNIGHT MAIL:** I enclosed the documents on the date shown below in an envelope or package provided by an overnight delivery carrier and addressed to the person at the addresses above. I placed the envelope or package for collection and overnight delivery at an office or a regular utilized drop box of the overnight delivery carrier.

Executed on **January 21, 2020** at Los Angeles, California.

☒ **State** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☐ **Federal** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.


ANGIE O. PAZ

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April, 2022, I caused the forgoing document to be filed electronically with the Clerk of the Court through the CM/ECF system for filing; and served on counsel of record via the Court's CM/ECF system as follows:

Paul S. Padda
Paul Padda Law, PLLC
4560 South Decatur Blvd., Suite 300
Las Vegas, Nevada 89103
(702) 366-1888
Fax: 702-366-1940
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